

LARSON ZIRZOW KAPLAN & COTTNER
KORY L. KAPLAN
Nevada Bar No. 13164
Email: kkaplan@lzkclaw.com
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Telephone: (702) 382-1170
Facsimile: (702) 382-1169
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZACHARY WHITE,

Plaintiff,

vs.

WAL-MART STORES, INC., a foreign
corporation; SAM'S WEST, INC. d/b/a
"SAM'S CLUB #4983," a foreign corporation;
DOES I-X and ROE ENTITIES I-X, inclusive,
Defendants.

CASE NO. Case No. 2:20-cv-00155-GMN-EJY

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DEADLINE FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S
PARTIAL MOTION TO DISMISS
PLAINTIFF'S COMPLAINT
(Third Request)**

Plaintiff Zachary White ("Plaintiff") and Defendant Sam's West, Inc. d/b/a Sam's Club #4983 ("Defendant") (collectively, the "Parties"), stipulate and agree as follows, under LR IA 6-1, LR IA 6-2, and LR 7-1:

1. On March 10, 2020, Defendant filed a Partial Motion to Dismiss Plaintiff's Complaint (the "Motion").

2. The Court Clerk has calendared the deadline for Plaintiff to respond to Defendant's Motion as March 24, 2020.

3. On March 31, 2020, an Order approving Stipulation and [Proposed] Order to Extend Deadline for Plaintiff to Respond to Defendant's Partial Motion to Dismiss Plaintiff's Complaint (First Request) was entered. The deadline for Plaintiff to respond to the Motion was extended to April 14, 2020.

4. On April 10, 2020, an Order approving Stipulation and [Proposed] Order to Extend Deadline for Plaintiff to Respond to Defendant's Partial Motion to Dismiss Plaintiff's Complaint

(Second Request) was entered. The deadline for Plaintiff to respond to the Motion was extended to May 5, 2020.

5. The Parties agree to extend the deadline for Plaintiff to respond to the Motion by two (2) weeks to May 19, 2020. Defendant shall have two (2) weeks thereafter to file its Reply.

6. Counsel for Plaintiff has requested the extension to provide ample time to prepare a response to Defendant's Motion due to the disruption of the office and personnel of counsel for Plaintiff due to the Covid-19 virus, and counsel for Defendant has agreed to the extension.

7. In addition, the Parties are discussing the potential for resolution of this case.

8. This is the third stipulation for an extension of time for Plaintiff to respond to Defendant's Motion, and the Stipulation is not made for purposes of delay.

Dated: May 4, 2020

Dated: May 4, 2020

Respectfully submitted,

Respectfully submitted,

LARSON ZIRZOW KAPLAN &
COTTNER

LITTLER MENDELSON, P.C.

/s/ Kory L. Kaplan
KORY L. KAPLAN
Nevada Bar No. 13164
850 E. Bonneville Ave.
Las Vegas, Nevada 89101

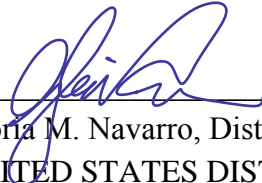
/s/ Z. Kathryn Branson
Z. KATHRYN BRANSON, ESQ.
Nevada Bar No. 11540
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937

Attorney for Plaintiff
ZACHARY WHITE

Attorneys for Defendant
SAM'S WEST, INC.

IT IS SO ORDERED.

Dated this 5 day of May, 2020.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

LARSON ZIRZOW KAPLAN & COTTNER
850 E. Bonneville Ave.
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169